



RADNOR • HAVERFORD • MARPLE

SEWER AUTHORITY

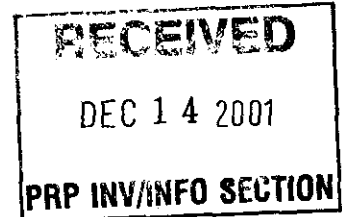
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13 December 2001

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029



Subject: Required Submission of Information from RHM Sewer Authority
Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill,
and Folcroft Landfill Annex


Dear Ms. Prisk:

In response to the 5 November 2001 letter received by the Radnor Haverford Marple (RHM) Sewer Authority from Mr. Larry Miller, Chief of the PRP Investigation and Site Information Section of EPA Region III, please find the enclosed attachment. This attachment provides responses to the questions included in Enclosure F of Mr. Miller's letter. Please be advised that these responses are based on very limited available information for the time period (1958 to 1976) referenced in Mr. Miller's letter. This is due to the fact that most of the files and records retained by the RHM Sewer Authority at its Operations Center on Glendale Road in Havertown, Pennsylvania, which borders Darby Creek, were lost or destroyed during the flood resulting from Hurricane Floyd in September 1999. In addition, please note that, following a request by Mr. John Toal, RHM's Solicitor, a 30-day extension of time had been granted to RHM by Mr. Brian Nishitani of EPA to respond to the 5 November letter.

Should additional information pertinent to this subject be obtained by RHM from other sources subsequent to this response letter, it will be forwarded to your attention immediately. If you have questions or need clarifications to the responses provided, please contact me at 610-446-0867.

Very truly yours,

Radnor Haverford Marple Sewer Authority


John A. Reardon
Manager of Operations

Attachment

cc: Authority Members
William Zahn
John H. Toal, Esquire
F.H. Williams

ATTACHMENT
RESPONSES TO ENCLOSURE F
OF
5 NOVEMBER 2001 EPA LETTER

Question No. 1:

State the name of your company, its mailing address, and telephone number. Further identify:

- a. The dates and states of incorporation of your company;
- b. The date and original state of incorporation of your company; and
- c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

Response:

- a. The Radnor Haverford Marple (RHM) Sewer Authority was incorporated 20 December 1967 in the State of Pennsylvania.
- b. The 20th of December 1967 in the State of Pennsylvania.
- c. The Radnor Haverford Marple Sewer Authority is the parent organization and has no subsidiaries or affiliated entities.

Question No. 2:

What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

Response:

The current nature of the Authority activities is the Operation and Maintenance of sewage flow metering stations, approximately 4 miles of 24-inch and 30-inch parallel interceptor sewers, television inspection of five member Township's sewage collection systems, and the performance of Infiltration/Inflow work to reduce extraneous water flowing into the sanitary sewage systems.

The nature of the Authority activities between 1958 and 1976 was Operation and Maintenance of approximately 4 miles of 24-inch and 30-inch interceptor sewers, a wastewater treatment plant, and commencement of television inspection, and performance of Infiltration/Inflow work.

In 1977, the wastewater treatment plant was demolished and all the sewage flow was directed to an existing 36-inch diameter interceptor sewer which conveyed the sewage to an existing interceptor sewer operated by the Darby Creek Joint Sewer Authority.

In addition, a 30-inch interceptor sewer was constructed parallel to the existing 30-inch interceptor sewer from the treatment plant site to Radnor Township for a distance of approximately 4 miles.

Question No. 3:

Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

Response:

John A. Reardon is still currently employed by the Authority.

John A. Reardon is employed by the RHM Sewer Authority as Manager of Operations.

- Date of employment is 1973.
- Current address is [REDACTED]
- Telephone number is [REDACTED]

Question No. 4:

Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:

- a. The dates of their operation;
- b. The nature of their operation; and
- c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

Response:

Radnor and Haverford Townships were the owners and operators from 1958 to 1967. Radnor Haverford Marple Sewer Authority is the owner and operator from 1967 to the present.

- a. John A. Reardon is the Manager of Operations from 1982 to the present.
- b. The nature of the operations is the same as described in response to Question No. 2 above.
- c. Virtually all records of operation of the RHM Sewer Authority facilities prior to the flooding of the Darby Creek in September 1999 due to Hurricane Floyd were lost in the flood.

Question No. 5:

Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;
- b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
- c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

Response:

Since all records of the operation of the RHM Authority facilities were lost in the flooding of Darby Creek due to Hurricane Floyd in September 1999, a description of the types of documents generated or maintenance is unknown and unavailable.

Question No. 6:

Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

- a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
- b. The chemical composition, characteristics, and physical state(solid, liquid, or gas) of each such hazardous substance;
- c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
- d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
- e. The types and sizes of containers in which these substances were transported and stored; and
- f. The persons or companies that supplied each such hazardous substance to your company.

Response:

This information is unknown and unavailable due to the flood of September 1999.

Question No. 7:

Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:

- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;

- b. The chemical composition, characteristics, and physical state(solid, liquid, or gas) of each such by-product or waste;
- c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
- d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
- e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
- f. The location and method of treatment and/or disposal of each such by-product or waste.

Response:

The waste products generated were treated effluent and sewage sludge.

- a. The treated effluent was discharged to Darby Creek by a stream discharge permit. The sewage sludge generated was initially spread on sand filters to dry and the dry cake hauled offsite. In the early 1970s, the sand filters were demolished and a sludge vacuum filter system was installed. The filter cake was collected and hauled offsite. The method of transportation and location of the final disposal of the dried sludge are unknown and unavailable. Records from that time, if any, were lost in the flood of September 1999.
- b. The chemical composition of the treated effluent and the sludge cake is unknown and unavailable. The characteristics and physical state of the treated effluent and sludge were liquid and dried cake solid.
- c. The annual quantities of each treated effluent and the sludge cake is unknown and unavailable.
- d. The types, sizes, and numbers of containers is unknown and unavailable.
- e. The name of the individual and/or company is unknown and unavailable.
- f. The location and method of treatment was the RHM Sewer Authority Wastewater Treatment Plant at 600 Glendale Road, Havertown, Pennsylvania.

Question No. 8:

Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckley Trash Hauling, Barratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc. and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:

- a. The person with whom you made such a contract or arrangement;

- b. The date(s) on which or time period during which such material was removed or transported for disposal;
- c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid solid, or gas);
- d. The annual quantity (number of loads, gallons, drums) of such material;
- e. The manner in which such material was containerized for shipment or disposal;
- f. The location to which such material was transported for disposal;
- g. The person(s) who selected the location to which such material was transported for disposal;
- h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

Response:

This information is unknown and unavailable.

Question No. 9:

Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:

- a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
- b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
- c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

Response:

RHM is still attempting to obtain the whereabouts of any individuals who may be able to provide additional information which may assist EPA in its investigation. RHM is aware, however, that certain individuals who may have had pertinent knowledge or information about this period (1958 to 1976) are now deceased, while others have relocated and/or their addresses are unavailable. Should RHM obtain the addresses and phone numbers of individuals who may have knowledge of the alleged activities described, they will be forwarded to EPA.

Question No. 10

For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:

- a. The date(s) on which such material was disposed of or treated at the Site;
- b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
- c. The annual quantity (number of loads, gallons, drums) of such material;
- d. The specific location on the Site where such material was disposed of or treated; and
- e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's (s') possession regarding arrangements made to dispose of or treat such material at the Site.

Response:

Of the available files remaining at the Radnor Haverford Marple (RHM) Sewer Authority Operations Center (which were not destroyed or lost in the flood from Hurricane Floyd in 1999) and have been researched, no operational records (of the type described by items a through e) relating to the transport or disposal of materials generated at RHM to the Clearview, Folcroft, or Folcroft Annex Landfills have been found for the period 1958 through 1976.

Question No. 11:

Did your establishment(s) or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:

- a. The date(s) the spill(s)/release(s) occurred;
- b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
- c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
- d. The packaging, transportation, and final disposition of the materials which were spilled/released.

Response:

The RHM Sewer Authority did generate sludge at the wastewater treatment plant which the Authority operated up until 1977 (see response to Question No. 7). The wastewater plant was taken out of operation and demolished at that time, and the Authority has since had responsibility for a 24-inch and 30-inch parallel sewer interceptor which runs along Darby Creek from Radnor Township (just north of Darby Road) to Haverford Township (near the RHM Operations Center), a distance of approximately four miles. For the period when the plant operated, no records are available as a result of the damage and loss occurring from the September 1999 flood.

Question No. 12:

Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for

payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

Response:

The response is the same as that presented for Question No. 3.

Question No. 13:

Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

Response:

None of the responders for RHM are aware of any environmental assessments or investigations being conducted on behalf of RHM at Clearview, Folcroft, and Folcroft Annex or other areas of the Superfund Site. None of the remaining available records at the RHM Operations Center indicate that any such assessments or investigations was conducted.

Question No. 14:

If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response:

The response is the same as that presented for Question No. 9.

Question No. 15:

Representative of your establishment(s):

- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.
- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Response:

- a. Persons answering questions on behalf of the RHM Sewer Authority:

Frederick H. Williams
[REDACTED]
[REDACTED]

Relationship to RHM: Engineering Consultant

William A. Zahn, P.E.

Roy F. Weston, Inc.

1400 Weston Way

P.O. Box 2653

West Chester, PA 19380

610-701-7545

Relationship to RHM: Authority Engineer

John A. Reardon

RHM Sewer Authority

600 Glendale Road

Havertown, PA 19083 610-446-0867

Relationship to RHM: Operations Manager

- c. Individual to whom future correspondence and phone calls should be directed:

John Reardon, RHM Operations Manager

RHM Sewer Authority

600 Glendale Road

Havertown, PA 19083

610-446-0867

Question No. 16:

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. Your document retention policy;
- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response:

- a. RHM currently has no formal records retention policy. Records and files are maintained and stored at the RHM Operations Center. A records retention policy is now being developed by RHM.

- b. As stated previously in the responses to this letter, virtually all of RHM's files and records were destroyed or lost as a result of the flood which occurred during Hurricane Floyd in September 1999 at the RHM Operations Center along Darby Creek in Havertown, Pennsylvania.
- c. Typical types of documents and records presently retained at the RHM Operations Center include:
- Sewer Authority correspondence
 - Authority Meeting Minutes
 - Payroll records/personnel files
 - Sewer Plan Drawings for RHM
 - Sewage Interceptor Flow records and portions of member townships from RHM meter stations
 - Annual Budget Reports and Budget Planning documents
 - Sewer Infiltration/Inflow data and reports
 - Vehicle and Equipment Maintenance Records
 - Daily Operation and Maintenance reports.
 - Vehicle and Equipment Procurement Bid Documents and Contracts
 - Insurance documents
 - *RHM Operations Center Building Plans*
- d. The individual responsible for compilation and retention of files and records at the RHM Operations Center is:
- John Reardon, Operations Manager
RHM Sewer Authority
600 Glendale Road
Havertown, PA 19083
610-446-0867